

required topics sufficiently. Documentation of training does not necessarily mean an employer has properly trained his or her employees. Was the training adequate? The training must be pesticide specific, unless the subject matter of training covers a chemically similar group of pesticides. [3CCR § 6724(b)]

Based on the response to questions asked of the employer and employees, determine if the training is provided in a language and manner the employees understand and that pesticide labeling is available at use sites.

Employers must record the date of training and the job assigned to the employee. Records must be kept for two years in a central workplace location accessible to employees.

Are there completed, signed and dated training records for all employees who handle pesticides? The employee must sign the training record. Are the training records current? Compare training records to pesticide use records to assure each employee has received training on each pesticide or chemically similar group of pesticides used.

Exemptions:

- Consumer products see 3CCR § 6720(e).
- Antimicrobial agents used as sanitizers, disinfectants or medical sterilants are exempt under the conditions of 3CCR § 6720(c).
- PCAs do not require handler training. (guidance)

Respiratory Protection Program

9. Written Program 3CCR § 6739(a)

Scope: Employers of persons wearing respirators when required by any pesticide labeling, restricted material permit condition, regulation or the employer. Employers of employees that voluntarily use respirators supplied by the employer.

Identify the respirator program administrator. Is he/she qualified? Can the administrator answer your questions about the program? (See 3CCR § 6000 definition of respirator program administrator).

Review the employer's written respiratory protection program. Does it contain written operating procedures for selecting, fitting, cleaning, sanitizing, inspecting, and maintaining respiratory protective equipment? Each person required to wear a respirator must be trained in the need, use, care and limitations of the equipment. Verify that the respirators and cartridges used are the types required by labeling, permit or regulation.

The employer is required to consult each employee annually and determine if the employee has had any problems related to the use of a respirator. If there are any negative findings, the employer must revise the written respiratory protection program to address them. Ask the employer when they consult the employees, if the consultation uncovered any problems and, if

so, what revisions were made to the written procedures. The employer must maintain the current version of the written respiratory protection program. All previous versions of the document must be retained for three years subsequent to it being amended.

Ask the employees how they were fit tested and if they have had any problems with the use of respirators. Ask the employer how he/she conducts evaluations to ensure compliance with the respirator program. Verify that the type of respirator and cartridge are appropriate for the pesticides handled.

For more information regarding employer requirements for respiratory protection, refer to Appendix 1, Pesticide Safety Information Series (PSIS), Leaflet A-5, “Respiratory Protection” and the “*Generic Guidelines for Development of a Respiratory Protection Program*” document available from DPR’s Worker Health and Safety Branch.

Exemptions:

- Employees who voluntarily use dust filtering respirators (dust masks) provided by the employer.
- Employees who voluntarily use any respirator not provided by the employer.
- PCAs or professional foresters and their employees performing crop adviser tasks. (3CCR § 6720)
- Consumer products see 3CCR § 6720(e).

10. Medical Evaluation 3CCR § 6739(q)(s)

Scope: Employers of persons wearing respirators when required by registered pesticide labeling, restricted material permit condition, regulations or the employer. Employers of employees that voluntarily use respirators supplied by the employer.

Verify that there is a medical recommendation form signed by a physician or health care professional for each employee assigned to performing work that requires wearing a respirator. Does it allow the employee to wear a respirator? Records generated from online evaluations are acceptable but must identify the physician or licensed health care professional and the evaluated employee.

The physician or health care professional will likely keep the medical evaluation questionnaires for each employee assigned to performing work that requires wearing a respirator, as the information it contains may be considered confidential under the American Health Insurance Portability and Accountability Act (HIPAA). It is not necessary to inspect the questionnaires.

Exemptions:

- Employees who voluntarily use dust filtering respirators (dust masks) provided by the employer.
- Employees who voluntarily use any respirator not provided by the employer.